



Electric Vehicle Charging Association

INNOVATION FOR CLEAN MOBILITY

Public EVSE Payment Standards *Design Principles for Washington State*

About the Electric Vehicle Charging Association

EVCA is a not-for-profit trade organization of twelve leading electric vehicle charging industry member-companies and one zero-emission autonomous fleet operator. EVCA's mission is to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the expeditious and efficient adoption of EVs and deployment of EV charging infrastructure.

EVCA has previously engaged on rulemaking processes related to payment standards, and shares these guiding principles as a set of “lessons learned” from those previous discussions to better inform the rulemaking process with a thoughtful and data driven approach.

Thank you for your consideration of these principles.

Guiding Principles

1. Site hosts and EV charging providers know their customers and have every motivation to make payment as easy and accessible as possible. Payment standards must empower site hosts to choose the payment methods that best suit their unique needs as provided for in SB 5192.

Note: Section 5(i) states that contactless credit card reader devices may be used to meet these requirements. We believe this underscores the importance of the role of the site host to make this determination based on what their customers' needs are.

2. Access must be balanced with other important factors the site hosts must consider when operating EV charging stations including, but not limited to: cost, reliability, maintenance, and security.

Note: Section 5(g) requires the Department to “minimize costs and maximize benefits” to the public, further underscoring that any payment standards established by the Department must be balanced against other issues.

3. Any payment standards requirements must be based on specific data driven metrics determined as an initial step in the rulemaking process..

4. WSDA must use research, data and analysis to consider all factors including additional access, cost, reliability, maintenance, and security when considering any payment standards.
5. Data and analysis should be properly cited and published throughout the rulemaking process.
6. Stakeholders should be allowed proper time to submit their own data to WSDA to help inform the rulemaking process.

Key Questions for Analysis

1. What, if any, evidence is available to demonstrate that EV drivers do not currently have adequate access to pay for EV charging services?
2. What are the reasons for that lack of access?
3. What payment options are currently widely available at EV charging stations?
4. What are the penetration/use rates of the following payment types across all physical retail transactions? How does Washington State compare to the United States more generally?
 - a. Mobile phone
 - b. RFID
 - c. Apple/Google Pay
 - d. Credit card (EMV)
 - e. Credit card (Contactless)
 - f. 1-800 number
 - g. QR code
5. How are these rates expected to change over the next 3-5 years?
6. How do these penetration rates compare to payment trends historically?
7. Which of the major banks have contactless cards already or plan to have contactless cards? Under what time frame?